

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

FOREST INVESTMENT  
ASSOCIATES L.P.,

Plaintiff,

V.

CIVIL ACTION

No. 5:19-CV-00065-RWS

APRIL THOMPSON, JAMES THOMPSON,  
JAMES THOMPSON TRUCKING, LLC,  
JAMES THOMPSON TRANSPORT, LLC,  
AND JAMES THOMPSON d/b/a JAMES  
THOMPSON RACING,

Defendants.

## PLAINTIFF'S UNOPPOSED MOTION FOR ATTORNEY FEES

COMES NOW Plaintiff, Forest Investment Associates L.P. (“FIA”), and for its unopposed motion for attorney fees respectfully states:

In granting Plaintiff's second motion for contempt, the Court announced its intention to award FIA the "reasonable attorneys' fees" incurred in prosecuting the motion. 4/7/22 Tr. at 32:11-18; Dkt. 155 at 9 (ordering the parties to "meet and confer regarding Plaintiff's reasonable and necessary attorney's fees."). FIA respectfully requests fees in the amount of \$15,033.00. Their reasonableness is established by the Declaration of Geoff Culbertson. Ex. 1.

Defendants' do not oppose the reasonableness or necessity of the fees requested herein.

FIA respectfully requests the Court Order Defendants to pay FIA's reasonable and necessary attorneys' fees of \$15,033.00.

Respectfully submitted,

/s/ Geoff Culbertson

Geoffrey P. Culbertson  
TX Bar No. 24045732  
PATTON, TIDWELL & CULBERTSON, LLP  
2800 Texas Boulevard  
Texarkana, TX 75503  
Telephone: (903) 792-5859  
Facsimile: (903) 792-8233  
[GPC@texarkanalaw.com](mailto:GPC@texarkanalaw.com)

S. Lawrence Polk (*Admitted pro hac vice*)  
Georgia Bar No. 582959  
Olga Greenberg (*Admitted pro hac vice*)  
Georgia Bar No. 307731  
999 Peachtree Street NE, Suite 2300  
Atlanta, GA 30309  
Phone: (404) 853-8000  
[larrypolk@eversheds-sutherland.com](mailto:larrypolk@eversheds-sutherland.com)  
[olgagreenberg@eversheds-sutherland.com](mailto:olgagreenberg@eversheds-sutherland.com)

**Counsel for Forest Investment Associates  
L.P.**

**CERTIFICATE OF CONFERENCE**

On April 22, 2022, counsel for Plaintiff, Geoff Culbertson, and counsel for Defendants, Darren Anderson, conferred regarding the relief requested herein. Defendants do not oppose the requested relief. Accordingly, this motion is unopposed.

/s/ Geoff Culbertson  
Geoffrey P. Culbertson

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on April 22, 2022.

/s/ Geoff Culbertson  
Geoffrey P. Culbertson